

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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UNITED STATES OF AMERICA,	:	
	:	
v.	:	
	:	Case No. 23-CR-307 (LJL)
MICHAEL SHVARTSMAN,	:	
GERALD SHVARTSMAN, and	:	
BRUCE GARELICK,	:	
	:	
	:	
Defendants.	:	
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**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and supporting Declaration of Tai H. Park, dated February 29, 2024, Defendant MICHAEL SHVARTSMAN will move before the Honorable Lewis J. Liman, United States District Judge for the Southern District of New York, located at 500 Pearl Street, New York, New York 10007, at a time to be set by the Court, to transfer the money laundering counts (Count Eleven and Count Twelve), as well as the forfeiture charges, of the Superseding Indictment, to the Southern District of Florida pursuant to Fed. R. Crim P. 21(b), and for a Bill of Particulars in connection with Count Eleven of the Superseding Indictment.

Dated: February 29, 2024

Respectfully submitted,

By: /s/ TAI H. PARK  
Tai H. Park

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